

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

United States of America

NOTICE OF MOTION

v.

23-cr-60

Peter Gerace, Jr.

Defendant.

Peter Gerace, Jr., by and through Eric M. Soehnlein, Esq., hereby moves this Court for an Order: (1) adjourning the date to file pretrial motions for thirty (30) days and (2) for such other and further relief as the Court deems just and proper.

DATED: April 7, 2025

SOEHNLEIN LAW PLLC

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ATTORNEY DECLARATION

v.

23-cr-60

Peter Gerace, Jr.

Defendant.

Eric M. Soehnlein, Esq., says the following under penalty of perjury:

1. I am an attorney at law duly licensed to practice in the United States District Court for the Western District of New York. I am counsel to Peter Gerace, Jr. in the above matter. As such, I am fully familiar with the facts and circumstances of this case.
2. As the Court knows, Mr. Gerace and counsel remain focused on post-trial briefing in consolidated matters 19-cr-227/23-cr-37. Post-trial briefing is due later this month. Moreover, because of recent events, additional motion practice is required in that matter.
3. Pretrial motions are due on April 7, 2025 in this case (Dkt.#61). It is not feasible for Mr. Gerace to be focused on the consolidated trial briefing and motion practice and this matter at the same time.

4. As a result, Mr. Gerace respectfully requests a further brief extension of the pretrial motion deadline in this case.
5. The government consents to this request.
6. We thank the Court for its time and attention.

DATED: April 7, 2025

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